

IN THE U.S. DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES of AMERICA

Plaintiff,

v.

18-00293-2

TREVOR SCOTT SPARKS

Defendant.

MOTION TO WITHDRAW

Appointed counsel Joseph W. Vanover, attorney for Defendant Trevor Scott Sparks, moves this Court withdraw the undersigned as counsel for Defendant Sparks and for the Court to appoint new conflict-free counsel to represent him. In support of this request, counsel states as follows:

SUGGESTIONS IN SUPPORT

1. Mr. Sparks and others were indicted on December 12, 2018 by a superseding Indictment (Doc. 18) which alleged Mr. Sparks engaged in a continuing criminal enterprise (count three), conspired to launder money (count two), possessed firearms in furtherance of crimes of violence and drug trafficking crimes (count four), and possessed firearms following conviction for a felony (count five). Mr. Sparks is presently charged with the same offenses by the third superseding Indictment (Doc. 261) filed July 21, 2020. Mr. Sparks has been held in custody since his arrest on December 18, 2018. The case is currently on the trial docket starting November 1, 2021. There are presently 25 defendants charged in one indictment.

2. Missouri Rule of Professional Conduct 4-1.7 provides, "a lawyer shall not represent a client if the representation involves a concurrent conflict.... A concurrent conflict of interest exists if... the representation of one client will be directly adverse to another client."

3. Mr. Sparks' interest is directly adverse to another client represented by the undersigned counsel. The undersigned counsel cannot represent Mr. Sparks and the other client

without violating the Rules of Professional Conduct.

4. Defendant Sparks has been advised of the existence of the conflict and the necessity that the undersigned counsel withdraw.

WHEREFORE, Joseph W. Vanover, counsel for Defendant Trevor Sparks, respectfully moves this Court to withdraw him as attorney for Mr. Sparks and for the appointment of conflict-free counsel for Defendant Sparks.

Vanover Law LLC

/s/ Joseph W. Vanover

Joseph W. Vanover, #48074
9800 NW Polo Dr., Ste 100
Kansas City, MO 64153
816-769-1948
fax 816-454-3678
jvanover@vanoverlaw.net
Attorney for Trevor Sparks

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that the above and foregoing was transmitted to opposing counsel of record via the CM-ECF system on the date electronically stamped on the lower edge of this document.

by: /s/ Joseph W. Vanover

Joseph W. Vanover #48074
Attorney for Trevor Sparks